### Form A- Annual Review 8360

# UTC Standard Annual Review Inspection Report Intrastate Operators FORM A: Annual Review

## **Inspector and Operator Information**

Inspection ID Inspection Link Inspector - Lead Inspector - Assist 8360 Dennis Ritter Records Location - City & State Operator Unit Ferndale Pipeline System Ferndale Pipeline System Inspection Start Date Inspection Exit Interview Date Engineer Submit Date 06-17-2021 06-17-2021

### Inspection Summary

You must include the following in your inspection summary:

- \*Inspection Scope and Summary \*Facilities visited and Total AFOD
- \* Summary of Significant Findings
- \* Primary Operator contacts and/or participants

Inspection Scope and Summary

The inspection was conducted virtually using MS Teams. There were no findings from the review.

Facilities visited and Total AFOD

June 17, 2021 records review via Teams 0.25 AFOD

Summary of Significant Findings (DO NOT Discuss Enforcement options)

There were no findings from the inspection

Primary Operator contacts and/or participants

Jim Bruen DOT Team Leader-Programs

Jim Fraley DOT Compliance Advisor

Operator executive contact and mailing address for any official correspondence

Gerald Maret, President

Ferndale Pipeline System

M.C. 9S 30S Wacker Drive, Chicago, Illinois 60606

## Instructions and Ratings Definitions

INSPECTION RESULTS: Annual Review			
Satisfactory Responses	Satisfactory List	Number of Unanswered Questions	Unanswered List
15	1,3,8,9,13,14,16,17,24,26,27,31,32,37,	0	
Unsatisfactory Responses	Unsatisfactory List		
0			
Area of Concern Responses	Area of Concern List		
0			
Not Applicable Responses	Not Applicable List		
21	4,5,6,7,10,12,15,18,19,20,21,22,23,25,28,35,3	9,40,42,43,44	
Yes Responses	Yes List	No Responses	No List
1	36,	3	34,38,41
Not Checked / Evaluated Responses	Not Checked / Evaluated List		
2	29,30,		

\*\*If an item is marked Unsat, AOC, N/A, or N/C, an explanation must be included in the "Notes" block for that question and also summarized in the "SUMMARY OF REQUIRED COMMENTS" section at the end of this inspection form.

## **Crew Inspection History**

### Click Link for Full List of Crew Inspections

Determination crew inspection Date	Inspector	Unit	Type of Work	Foreman Name	Contractor Name	Comments / Observations for Operator
No crew inspections found						

## Facility Inspection History

## Link for Full List of Facility Inspections

Date	Inspection ID	Form A Operator Name	Other Company	Inspector	Type of Inspection	Do you have inspection pictures or file attachments?
No facility	inspections found					

## **Scheduled Inspection History**

## Annual Review Inspection History

Year of Inspection	Facility - Operator	Unit Name	Inspection ID	Inspection Type	Inspection Status	Closed Date	Next Inspection Interval	SHAREPOINT
Ferndale Pipeli	ne System (12 Inspec	tions)						
2021	Ferndale Pipeline System	Ferndale Pipeline System	8076	Standard Comprehensive - GT	Pending			Documents
2021	Ferndale Pipeline System	Ferndale Pipeline System	8088	TIMP - Gas Transmission Integrity Management	Complete	03-08-2021	03-03-2024	Documents
2021	Ferndale Pipeline System	Ferndale Pipeline System	8360	Standard - Annual Review	In the Workflow		06-17-2022	Documents
2020	Ferndale Pipeline System	Ferndale Pipeline System	8089	OM PPR GAS - Operations & Maintenance, Plans & Procedures Review	Complete	04-19-2021	01-29-2025	Documents

Year of Inspection	Facility - Operator	Unit Name	Inspection ID	Inspection Type	Inspection Status	Closed Date	Next Inspection Interval	SHAREPOINT
2020	Ferndale Pipeline System	Ferndale Pipeline System	8153	CRM - GAS	Pending			Documents
2019	Ferndale Pipeline System	Ferndale Pipeline System	7844	OQ - Operator Qualification	Complete	03-06-2019	01-24-2023	Documents
2018	Ferndale Pipeline System	Ferndale Pipeline System	7573	Standard Comprehensive - GT	Complete	08-31-2018	08-16-2021	Documents
2017	Ferndale Pipeline System	Ferndale Pipeline System	7235	TIMP - Gas Transmission Integrity Management	Complete	11-08-2017	08-23-2020	Documents
2016	Ferndale Pipeline System	Ferndale Pipeline System	6767	CRM - GAS	Complete	11-09-2016	10-13-2020	Documents
2015	Ferndale Pipeline System	Ferndale Pipeline System	6204	PA - Public Awareness	Complete	11-09-2015	10-22-2019	Documents
2015	Ferndale Pipeline System	Ferndale Pipeline System	6220	Standard Comprehensive - GT	Complete	08-27-2015	07-23-2018	Documents
2015	Ferndale Pipeline	Ferndale Pipeline	6221	OM PPR GAS - Operations & Maintenance, Plans & Procedures	Complete	11-09-2015	10-22-2019	Documents

## GAS System Operations History

Annual Report -	Miles of Main			A
Year	SYSTEM TOTAL Miles of Main	Miles of Service	SYSTEM TOTAL NO. of Services	Average Service Length
No reports four	nd			

Annual Keport GA	S Iransmission Miles	
YEAR	Total Total Miles	e. Total tool mileage inspected in calendar year using in-line inspection tools
2020	36.2	9
2019	36.2	63.4
2018	36.2	0
2015	36.2	0
2016	36.2	0
2017	36.2	0
TOT	217.2	72.4

### Annual Report - Leaks

Year	Cause of Leak Mains Total	Cause of Leak Mains Hazardous Total	Cause of Leak Services Total	Cause of Leak Services Hazardous Total	NUMBER OF KNOWN SYSTEM LEAKS AT END OF YEAR SCHEDULED FOR REPAIR
No reports fo	und				

### Annual Report - EFV

Operator	Year	Number of EFV's Installed This Calendar Year on Single Family Residential Services:	Estimated Number of EFV's in the system at the End of The Year:	Total Number of Services with EFV Installed During Year:	Estimated Number of Services with EFV In The System At The End of The Year:	* Total Number of Manual Service Line Shut-off Valves Installed During Year:	* Estimated Number of Services with Manual Service Line Shut-off Valves Installed in the System at End of Year:
No reports fou	ınd						

## HL System Operations History

## HL Annual Report - Miles of Pipe by Decade

YEAR Operator Commodity Part I - Total Miles of Pipe by Decade Unknown Pre- 1920 192	
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## No reports found

IL Annual R	leport - HL Miles	/ HCAs				HL Annual I	Report - Breakou	t Tanks

HL Annual R	HL Annual Report - HL Miles / HCAs									HL Annual Report - Breakout Tanks						
YEAR	Operator	Commodity Group	Total Segment Miles that Could	High Population	Other Population	Drinking Water	Ecological Resource	Comm Navigable Water	YEAR	Operator	Commodity Group	Crude Oil #5	Refined (non HVL) #5	HVL #5	CO2 #5	F Gra
			Affect HCAs						No report	s found						
No reports	No reports found															

## ANNUAL REPORT: ACCURACY/TRENDS

Question #1. 1. Result

Was the Annual Report reviewed for accuracy and trends? If any trends were discovered, please describe. Satisfactory

1. Notes

Annual reports were reviewed for 2018-2020. Accurate and no trends evident.

Year	SYSTEM TOTAL Miles of Main	Miles of Service	SYSTEM TOTAL NO. of Services	Average Service Length
No reports	found			

	Access to C	Access to C	omplete			
	YEAR	Operator	Commodity Group	Total Total Miles	YEAR	Oper
				Trilles	No reports	found
ł	Ferndal	e Pipeline System (6	Reports)			
	2020	Ferndale Pipeline System	Natural Gas	36.2		
	2019	Ferndale Pipeline System	Natural Gas	36.2		
	2018	Ferndale Pipeline System	Natural Gas	36.2		

Ferndale Pipeline System Natural Gas

Ferndale Pipeline System Natural Gas

Ferndale Pipeline System Natural Gas

Access to Co	omplete Hazard	ous Liquid Annual Report	
YFAR	Operator	Commodity Group	

36.2

36.2

36.2

## DAMAGE PREVENTION

Annual Rep	oort Damage Pre	evention data														
Year	Operator	Number of Excavation Tickets	Total Number of Excavation Damages By Apparent Root Cause:	Locating Practices Not Sufficient:	One-Call Notification Practices Not Sufficient:	Excavation Practices Not Sufficient:	Other:	Number of Services	Total Leaks - Excavation Damage	Total Main Leaks	Miles of Service MAIN	Number of Leaks per Mile of MAIN	Total Leaks Per 1,000 Locates	Number of Hits Per 1,000 Ticket Requests	Number of Hits Per 10,000 Services	
No damag	No damageses found															

2015

2016

2017

### DIRT data on mismarks for prior year DIRT Timeliness - Prior Year Reports must be submitted within 45 days of the damage Damage Cause Submit Company ID-UTC final NameNumber of Reports Reports No records found No records found Question #2. Review the following damage prevention items: Q2. Is the damage prevention information in the annual report complete? Q2.b. Is the annual report damages root cause information complete and accurate? Q2.c. Does the operator have a process to evaluate the cause of "One-call notification not sufficient" category? http://Yes Yes Q2.d Does the operator follow a process to evaluate the cause of "Locating Q2.e. Is the operator or its contractor qualified and following procedures for Q2.f. Is the operator appropriately requalifying locators to address performance def locating and marking facilities? practices not sufficient" category? yes Q2.g. What is the number of damages resulting from mismarks? Q2.h. What is the number of damages resulting from not locating within the time Q2.i. Is the operator appropriately addressing discovered mapping errors resulting excavation damage? 0 Q2.j. Are mapping corrections timely and according to written procedures? Q2.k. Does the operator follow a process to evaluate causes for damages listed Q2.L. Is the operator appropriately focusing damage prevention education and train "Excavation Practices Not Sufficient"? address the causes of excavation damage? yes-although no mapping errors occurred no use root cause analysis As this is an interstate operator (this line is intrastate) use their root cause analysis for any near miss and damage associated with 3rd party damage. There have been no incidents reported for this line since the last inspection. NPMS SUBMISSIONS/CHANGES Question #3. 3. Result For transmission operators, has the operator submitted information to the NPMS database, along with changes made after the original submission? Satisfactory 3. Notes Reviewed PHMSA email stating NPMS was updated. March 7, 2019 for year end 2018 March 6, 2019 for year end 2019 February 24, 2019 for year end 2020 INCIDENT/SRC/AOC REPORTS REVIEW Question #4 4. Results Were there any federally reportable incidents during the previous year? Are there any discernable trends to these incidents? Not Applicable no federally reportable incidents since the last inspection Q4: Federally reportable incidents NotificationID Operator NRC# Assigned Engineer Date & Time of Incident Street Address of event/incident Incident Address: City Closure Date Reporting Level Company No incident notifications found Question #5. 5. Result Review operator records of previous year's accidents and failures including reported third party damage and leak response. Is the operator ensuring appropriate evaluation and response as required in 192.617 (Gas) or 195.402 (HL) to determine cause of failure? Is the operator taking appropriate steps to minimize the possibility of reoccurrence? Not Applicable no incidents reported for the line since the last inspection Question #6. Review incident reports for the previous year for accuracy and identify any trends. If any trends discovered please describe. (Please see list of incident data at end of this report) Q6: Incident Reports 6. Result Not Applicable NotificationID Inspector Company Street Address of event/incident Date & Time of Incident Is 30-Day Reporting Level Report Received? No incident notifications found 6. Notes no incidents reported for the line since the last inspection Question #7. Were there reportable or unreportable safety related conditions during the previous year? If yes please describe Q7: Report of SRCs 7. Result Not Applicable Safety-Related Condition NotificationID Company SafetyRelatedConditionChoices Reportable? Date & Time of Incident Company Notified Date Report Date No incident notifications found 7. Notes no safety related conditions since the last inspection Question #8. 8. Result Satisfactory For transmission systems, were there any abnormal operating conditions (as described in 192.605 (c) or 195.402(d)) since the last annual review? If yes please describe. Reviewed "UG" list (Maximo work order prefix for abnormal)-2018-2020-there were only two on in 2019 and one in 2020 7326754-2019 leak alarm Ferndale--control valve set too high for incoming pressure at Intalco. Intalco shut down so don't use much gas, trying to dial in a new set point for minimal gas flow. 7757949-2020 sumas high pressure-control valve set too high. Intalco shut down so don't use much gas, trying to dial in a new set point for minimal gas flow. **O&M & EMERGENCY PROGRAMS** Question #9. 9. Result Operator Manuals on Sharepoint Is the O&M Manual up to date and were changes made in the previous year? Satisfactory WUTC, conducted a review of BP's Ferndale Pipeline System Operations and Emergency Response Manual from Dec 15, 2020 to March 31, 2021. There were no findings from this inspection and no changes to the manual since the last inspection.

10. Result

Not Applicable

Question #10.

10. Notes

If changes to the O&M were made, are changes acceptable?

WUTC, conducted a review of BP's Ferndale Pipeline System Operations and Emergency Response Manual from Dec 15, 2020 to March 31, 2021. There were no findings from this inspection and no changes to the manual since the last inspection

### Question #11.

Were emergency plans changed during the previous year?

### 11. Result

Satisfactory

### 11. Notes

WUTC, conducted a review of BP's Ferndale Pipeline System Operations and Emergency Response Manual from Dec 15, 2020 to March 31, 2021. There were no findings from this inspection and no changes to the manual since the last inspection

Were any changes to emergency plans satisfactory?

### 12. Result

Not Applicable

### 12. Notes

WUTC, conducted a review of BP's Ferndale Pipeline System Operations and Emergency Response Manual from Dec 15, 2020 to March 31, 2021. There were no findings from this inspection and no changes to the manual since the last inspection

## INITEODITY MANAGEMENT DOCODAMO

INTEGRITY MANAGEMENT PROGRAMS	
Question #13 Were there changes to the Integrity Management programs (TIMP, DIMP or both, as applicable)?	13. Result Satisfactory
13. Notes  WUTC conducted a TIMP inspection from March 1 to March 3, 2021. There were no findings from the inspection. No changes to TIMP since the UTC TIMP inspection.	
Question #14.  Is the DIMP/TIMP up to date? What are the results of the operator's program review (effectiveness evaluation) (DIMP every 5 years)?	14. Result Satisfactory
14. Notes  WUTC conducted a TIMP inspection from March 1 to March 3, 2021. There were no findings from the inspection. No changes to TIMP since the UTC TIMP inspection.	
Question #15 Are IMP program changes acceptable?	15. Result Not Applicable
15. Notes  WUTC conducted a TIMP inspection from March 1 to March 3, 2021. There were no findings from the inspection. No changes to TIMP since the UTC TIMP inspection.	
Question #16 Was appropriate assessment/repair work conducted during the past year? (monitor progress of IMP activities)	16. Results Satisfactory
16. Notes WUTC conducted a TIMP inspection from March 1 to March 3, 2021. There were no findings from the inspection. BP conducted one ILI dig on the line in 2020. No repair only recoat.	
Question #17  Does the operator's HCA location data correspond to the positional data located in UTC GIS?	17. Results Satisfactory
17. Notes	
Reviewed HCA maps from Dec 2020 during Ferndale Pipeline Inspection and confirmed 5 locations in field (4 on 16" mainline, 1 on Intalco 8").	
WUTC conducted a TIMP inspection from March 1 to March 3, 2021. There were no findings from the inspection. No changes to TIMP since the UTC TIMP inspection.	
Question #18 What assessment work is planned for the upcoming year?	18. Results Not Applicable
18. Notes No assessment work planned for 2021	
Question #19 Within the operator's DIMP, are low pressure systems evaluated for overpressure threats?	19. Results Not Applicable
19. Notes Transmission operator	
Question #20 Did the operator develop and follow specific procedures for low pressure system construction or maintenance projects? (Note: this question is revisited in greater detail in the ADB review section)	20. Results Not Applicable
20. Notes	
Transmission operator	
Question #21  Are plastic pipe and components that have shown a record of defects/leaks being mitigated through the DIMP plans?	21. Results Not Applicable

22. Results

23. Results

Not Applicable

Not Applicable

21 Notes

Transmission operator

## Question #22

 $Has appropriate DIMP \ remediation \ work \ occurred \ during \ the \ past \ year? \ (monitor \ progress \ of \ DIMP \ activities)$ 

Transmission operator

### Question #23

What DIMP remediation work is anticipated for upcoming year?

### 23. Notes

Transmission operator

## **OQ PROGRAM**

Question #24	24. Results
Is the OQ program up to date? Were there changes to the Operator Qualification (OQ) program in the last year? If yes, please describe.	Satisfactory

### 24. Notes

WUTC conducted a OQ inspection on BP Pipelines NA and Ferndale Pipeline Systems from Jan 23 to Jan 24, 2019. There were no issues noted from the inspection. There have been no changes to the plan since the WUTC inspection.

Question #25	25. Results
Are the OQ plan updates satisfactory?	Not Applicable

WITC conducted a OQ inspection on BP Pipelines NA and Ferndale Pipeline Systems from Jan 23 to Jan 24, 2019. There were no issues noted from the inspection. There have been no changes to the plan since the WUTC inspection.

Question #26	26. Results
Are personnel performing covered tasks (including contractors) properly qualified and requalified at intervals determined in the operator's plan?	Satisfactory

WUTC conducted a OQ inspection on BP Pipelines NA and Ferndale Pipeline Systems from Jan 23 to Jan 24, 2019. There were no issues noted from the inspection. There have been no changes to the plan since the WUTC inspection.

OQs for covered tasks were checked as follows:

16" Mainline, 516+70 P ILI dig 7/2/20- sandblasted pipe at indication, and recoated. No repair necessary,

Hanging H

Kyle Meeker 32, 39, 7.5, 7.7

Bernard Yost 32, 39

Justin Johnson 32, 39, 7.2, 7.4, 7.5

Applus

Nate Henderson 1.1, 8.1, 8.2, 8.3, 38.6, 38.7

TIR

Jim Cargill 5.1,5.2,5.3, 7.7

These tasks are associated with ISNetWorld OQ

### PUBLIC AWARENESS PROGRAM

27. Results Question #27 Is the PA program up to date? And were there changes to the Public Awareness (PA) program within the last year? Satisfactory

27. Notes

WUTC conducted a Public Awareness inspection of BP Pipelines NA-which includes BP Cherry Point Butane and Crude, Ferndale Gas and the Olympic Laterals from Oct 19, 2020 to Oct 20, 2020. There were no findings from the inspection.

There have been no changes to the program since the WUTC inspection.

Question #28 28. Results Are changes to the PA program satisfactory? Not Applicable

28. Notes

WUTC conducted a Public Awareness inspection of BP Pipelines NA-which includes BP Cherry Point Butane and Crude, Ferndale Gas and the Olympic Laterals from Oct 19, 2020 to Oct 20, 2020. There were no findings from the inspection.

There have been no changes to the program since the WUTC inspection.

### **CONTROL ROOM PROGRAM**

Question #29 29. Results Is the CRM program up to date? And were there changes to the Control Room Management (CRM) program within the last year? Not Checked/Evaluated

A PHMSA CRM audit was conducted in 2020 of BP control room in Tulsa OK. The results of this audit have not been finalized by PHMSA. Any changes to the CRM will be based on results from audit.

Question #30

Are the CRM program changes satisfactory? Not Checked/Evaluated

30. Notes

A PHMSA CRM audit was conducted in 2020 of BP control room in Tulsa OK. The results of this audit have not been finalized by PHMSA. Any changes to the CRM will be based on results from audit.

## SAFETY MANAGEMENT SYSTEM API 1173

Question #31 31. Results

Is the operator developing and implementing an API 1173 Safety Management System? Satisfactory

OMS-Operating Management System which is a BP safety management system. BP is evaluating their SMS with the API 1173 standard.

### INSPECTOR ASSESSMENT OF INSPECTION UNITS

Question #32 32. Results

Are inspection units broken down appropriately? Do you recommend any changes to inspection units? Satisfactory

32. Note:

Only one unit

Q32: List of current inspection units

Unit Name	Distribution/Transmission	Intrastate or Interstate?	GAS or LIQUID			
Ferndale Pipeline Sy	stem (1 Unit)					
Ferndale Pipeline System Transmission Intrastate Gas						

## OPERATOR'S PUBLIC WEB PAGE

Question #33

For informational purposes: Using the drop down selections available in the "Results" block, indicate whether the operator's web page contains the information listed by placing a check in the box adjacent to all items that are present.

33. Results

Q33.A Pipeline Purpose and Reliability; Q33.B Damage Prevention; Q33.C Pipe Location Information; Q33.D How to get additional information; Q33.F On Call Requirements; Q33.G Potential Hazards; Q33.H Prevention Measures; Q33.L Leak/Damage Recognition; Q33.J ROW Encroachment; Q33.K Pipeline Location Information; Q33.M Emergency

33. Notes

## ADVISORY BULLETIN REVIEW

### Question #34

Is there potential for damage to the operator's pipeline facilities caused by flooding, river scour, or channel migration?

ADB 2019-01 34. Results ADB 2019-01 Flood Mitigation NO

34. Notes

 $Ferndale\ Gas\ pipeline\ does\ not\ cross\ waterways\ with\ scour\ potential.\ Operator\ is\ aware\ of\ the\ ADB$ 

### Question #35

If "YES" to Q34, did the operator take appropriate action in accordance with the guidance contained ADB 2019-01? Discuss ADB's guidance with operator's representative, and annotate any

ADB 2019-01

ADB 2019-01: Flood Mitigation

35. Results Not Applicable

35. Notes  $Ferndale\ Gas\ pipeline\ does\ not\ cross\ waterways\ with\ scour\ potential.\ Operator\ is\ aware\ of\ the\ ADB$ 

Is there potential for the operator's system to be damaged by earth movement or other seismic/geological activities?

ADB 2019-02 ADB 2019-02: Earth Movement/Geological Hazards 36. Results

YES

### 36 Notes

Seismicity: Determined to be in an area with an earthquake instrumental intensity scale = 4 which means light shaking and therefore is considered a lower threat to pipeline integrity. Regardless, we monitor for earthquakes in proximity to the pipeline system and respond in accordance to our earthquake response process

### Question #37

If "YES" to Q36, did the operator take appropriate action according to ADB 2019-02? Discuss suggested actions from ADB with operator's representative and annotate any concerns.

ADB 2019-02

37 Results Satisfactory

ADB 2019-02: Earth Movement/Geological Hazards

37. Note:

Seismicity: Determined to be in an area with an earthquake instrumental intensity scale = 4 which means light shaking and therefore is considered a lower threat to pipeline integrity. Regardless, we monitor for earthquakes in proximity to the pipeline system and respond in accordance to our earthquake response process

### Question #38

Does the operator have any indoor meter sets or regulators in their system?

ADB 2020-01

38. Results

NO

ADB 2020-01 Inside Meter Sets

38. Notes

Transmission operator

## Question #39

If operator's system has indoor meter sets/regulators, did the operator review ADB 2020-0115? Discuss ADB guidance with operator's representative and annotate any concerns. Particular attention must be given to the operator's plan to conduct leak surveys, AC inspections, and other maintenance activities in locations that are difficult to access, as well as the inclusion of inside meters/regulators within the operator's DIMP plan, as applicable.

39. Results

ADB 2020-01 Inside Meter Sets

Not Applicable

39. Notes

Transmission operator

Question #40

Is the operator's record of locations for all indoor meter sets/regulators within their system complete and sufficently detailed??

ADB 2020-01

40. Results

ADB 2020-01 Inside Meter Sets

Not Applicable

40 Notes

Transmission operator

Does the operator have any low pressure systems?

ADB 2020-02

41. Results

ADB 2020-02 Low Pressure Systems

NO

41. Notes

Transmission operator

Question #42

If "YES" to Q41, did the operator review ADB 2020-0025 for Overpressure Protection of Low-Pressure Natural Gas Distribution Systems? Review ADB guidance with operator and annotate

ADB 2020-02

42. Results Not Applicable

ADB 2020-02 Low Pressure Systems

42. Notes

## Question #43

For low pressure construction/maintenance projects, does the operator have a process for review of engineering plans and constructibility reviews that are carried out through all applicable departments? Do all applicable departments review project plans for accuracy, completeness and correctness? How are control procedures developed that could identity system threats that could result in a common failure mode? How is the operator mitigating risk in their low presure system?

ADB 2020-02 Low Pressure Systems

43. Results

43. Notes

Not Applicable

### Transmission operator

## Question #44

Does the operator include all low-pressure system risks in their DIMP program appropriately?

ADB 2020-02

44. Results

ADB 2020-02 Low Pressure Systems

Not Applicable

## 44. Notes

## SUMMARY OF REQUIRED COMMENTS

COMMENTS: Required for any ratings other than Satisfactory. Summarize/consolidate entries from the "Notes" blocks above. Ensure you annotate the question number for each comment.

Question 4-no federally reportable incidents since the last inspection

Question 5-no incidents reported for the line since the last inspection

Question 6-no incidents reported for the line since the last inspection

Question 7-no safety related conditions since the last inspection

Question 10-WUTC, conducted a review of BP's Ferndale Pipeline System Operations and Emergency Response Manual from Dec 15, 2020 to March 31, 2021. There were no findings from this inspection and no changes to the manual since the last inspection

Question 12-WUTC, conducted a review of BP's Ferndale Pipeline System Operations and Emergency Response Manual from Dec 15, 2020 to March 31, 2021. There were no findings from this inspection and no changes to the manual since the last inspection

Question 15-WUTC conducted a TIMP inspection from March 1 to March 3, 2021. There were no findings from the inspection. No changes to TIMP since the UTC TIMP inspection.

Question 18-No assessment work planned for 2021

Question 19,20,21,22-Transmission operator

Question 25-WUTC conducted a OQ inspection on BP Pipelines NA and Ferndale Pipeline Systems from Jan23 to Jan 24, 2019. There were no issues noted from the inspection. There have been no changes to the plan since the WUTC inspection.

Question 28-WUTC conducted a Public Awareness inspection of BP Pipelines NA-which includes BP Cherry Point Butane and Crude, Ferndale Gas and the Olympic Laterals from Oct 19, 2020 to Oct 20, 2020. There were no findings from the inspection.

There have been no changes to the program since the WUTC inspection.

Question 29,30-A PHMSA CRM audit was conducted in 2020 of BP control room in Tulsa OK. The results of this audit have not been finalized by PHMSA. Any changes to the CRM will be

Question 35-Ferndale Gas pipeline does not cross waterways with scour potential. Operator is aware of the ADB

Question 39,40,41,42,43,44-Transmission operator